

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

Stephanie McAfee,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civ. No. 4:19-cv-4320
	§	
U.S. Department of Veteran	§	
Affairs, Maria Lewis Wilson,	§	
Kendra Price Mays, Christopher	§	
Sandles, and Carolyn Baldwin,	§	
	§	
Defendants.	§	

United States of America's Notice of Removal

The Defendants file this Notice of Removal pursuant to 28 U.S.C. §§ 1442 and 1446.

Grounds for Removal

On September 9, 2019, Stephanie McAfee filed suit against the United States Department of Veteran Affairs and others alleging employment discrimination and requesting both compensatory and injunctive relief. Removal is proper under 28 U.S.C. § 1442(a)(1) because the plaintiff filed suit against a United States agency.

Index of Matters Being Filed

Pursuant to LR 81, the United States attaches the following documents:

- (a) the Plaintiff's Original Complaint, and
- (b) a copy of the docket sheet.

No process has been executed in the case, and the state court has not entered any orders.

Notice

The counsel of record in the state-court action, including addresses, telephone numbers, and parties represented, are as follows:

Andre D. Evans
Texas State Bar No. 24082970
3003 South Loop West, Suite 108
Houston, Texas 77054
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Attorney for Stephanie McAfee

and

Richard A. Kincheloe
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Telephone: (713) 567-9422
Facsimile: (713) 718-3033
Email: Richard.Kincheloe@usdoj.gov
Attorney for Defendants

Written notice of the filing of this Notice of Removal is being served on all parties who have appeared in the removed lawsuit by and through their above-listed counsel, and a copy of the Notice of Removal is being filed contemporaneously with the Clerk of the District Court of Harris County, Texas. A copy of the Notice to State Court of Filing of Notice of Removal, without exhibits, is attached.

Accordingly, the United States requests that this matter be removed from the District Court of Harris County, Texas, 269th Judicial District, to the United States District Court for the Southern District of Texas, Houston Division.

Dated: November 4, 2019.

Respectfully submitted,

RYAN K. PATRICK,
United States Attorney

By: s/ Richard A. Kincheloe
Richard A. Kincheloe
Assistant United States Attorney
Attorney-in-Charge
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Attorney for the United States

Certificate of Service

The undersigned certifies that the foregoing Notice was served on Andre D. Evans, counsel for Stephanie McAfee, on November 4, 2019, by first-class U.S. mail, postage prepaid, at 3003 South Loop West, Suite 108, Houston, Texas 77054.

s/ Richard A. Kincheloe
Richard A. Kincheloe
Assistant United States Attorney